

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING PHARMACY CASES

Master Docket No.12-12052-FDS

This Document Relates To:

KATHLEEN GUZMAN,

Plaintiff,

V.

NEW ENGLAND COMPOUNDING
PHARMACY, INC. d/b/a
NEW ENGLAND COMPOUNDING
CENTER,

Defendant.

CIVIL ACTION NO: 1:12-cv-12208-FDS

ASSENTED-TO MOTION FOR AN EXTENSION OF TIME TO JANUARY 2, 2013
TO ANSWER THE PLAINTIFF'S COMPLAINT

Defendant New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center (“Defendant”) moves this Court for An Extension of Time to January 2, 2013 for Defendant to Answer the Plaintiff’s Complaint. The motion should be granted because an Defendant’s Opposition to the Plaintiff’s Motion to Remand is due by December 21, 2012, and it will be in the interest of judicial economy for the answer to be due after the remand issue has been decided. Further, the Defendant requires additional time to answer the allegations and has acted in good faith. Moreover, Plaintiff will not suffer any prejudice if the motion is granted, and the Plaintiff has assented to this motion. In further support of the motion, the Defendant attaches a memorandum of law.

WHEREFORE, New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center, requests that the Court grant its Assented-To Motion for An Extension of Time to January 2, 2013 to Answer the Plaintiff's Complaint.

Respectfully submitted,

Defendant,
New England Compounding Pharmacy, Inc.,
By its Attorneys,

/s/ Geoffrey M. Coan

Geoffrey M. Coan, BBO # 641998

Daniel E. Tranen, BBO # 675240

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Date: December 19, 2012

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

In accordance with Local Rule 7.1(a)(2), I, Garrett D. Lee, do hereby certify that I conferred with Plaintiff's counsel regarding Defendant's Assented-To Motion for an Extension of Time to January 2, 2013 to Answer the Plaintiffs' Complaint.

Dated: December 19, 2012

/s/ Garrett D. Lee

Garrett D. Lee

CERTIFICATE OF SERVICE

I, Geoffrey M. Coan, hereby certify that on this 19th day of December, 2012, the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Geoffrey M. Coan
Geoffrey M. Coan